

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO
LAS CRUCES DIVISION

JORDAN DAIGLE,
Individually and on behalf
of all others similarly situated,

Plaintiff,

V.

**TURNCO ENTERPRISES, LLC.,
and MEWBOURNE OIL CO.,**

Defendants.

Civil Action No. 2:20-cv-00652-KWR-KRS

JURY TRIAL DEMANDED

COLLECTIVE ACTION

PURSUANT TO 29 U.S.C. § 216(b)

DECLARATION OF CLIF ALEXANDER

I, Clif Alexander, being of sound mind and over the age of 18, make the following statements.

1. The facts contained in this declaration are within my personal knowledge and are true and correct.
2. I am a co-founding partner of Anderson Alexander, PLLC, and have served as lead counsel for Plaintiff and the Collective Members in this lawsuit.
3. I submit this declaration in support of Plaintiff's Motion to Enforce Settlement Agreement and Release of Claims ("Motion"). I have reviewed the Motion and the facts contained therein and they are true and correct, to the best of my knowledge.
4. On July 2, 2020, Plaintiff Jordan Daigle, on behalf of himself and other similarly situated oilfield workers filed this case against Defendants, Turnco Enterprises, LLC and Mewbourne Oil Co. This matter reached a settlement on April 15, 2022 between Plaintiff, on behalf of himself and the Opt-In Plaintiffs (collectively, "Plaintiffs"), and between Defendant Turnco. The settlement was memorialized in writing and the Settlement Agreement and Release (the "Agreement") was executed on May 31, 2022.
5. Plaintiffs have not received any payments from Turnco pursuant to the terms of the Agreement.
6. I have discussed Turnco's lack of payment with their Counsel, Will C. Griffis of McCleskey, Harriger, Brazill & Graf LLP. After communicating with Mr. Griffis, I was hopeful Turnco was going to honor their obligations under the Agreement and propose and amended payment

schedule. Despite these conversations, Turnco never proposed an amended payment schedule and Plaintiffs have yet to receive any funds.

7. Accordingly, I authorized pursuing enforcement of the Agreement and the preparation of the Motion.
8. The detailed credentials of Anderson Alexander, PLLC and the attorneys who performed work on this matter are included in the Declaration I submitted in support of Plaintiff's Unopposed Motion to Approve FLSA Settlement and Attorneys' Fees and Costs, and are incorporated herein. *See* ECF No. 55-2 at 4–13.
9. Casey Kellum, an attorney with Anderson Alexander, PLLC, also worked on this case. Ms. Kellum began working with Anderson Alexander, PLLC as an associate attorney in 2022. Ms. Kellum's practice with Anderson Alexander, PLLC focuses exclusively on complex representative actions where she diligently represents individuals in class and collective actions, in addition to individual lawsuits, across the United States. Ms. Kellum graduated from St. Mary's School of Law in 2020. She is a member of the Texas Employment Lawyers Association ("TELA"). Upon arriving in Corpus Christi, Ms. Kellum has become an active member in local bar associations, including the Corpus Christi Bar Association, Corpus Christi Young Lawyers Association, and the Coastal Bend Women Lawyers' Association. Her hourly rate is \$350.00 which is reasonable for an attorney of her skill and experience in this specialized body of law in this District.
10. Anderson Alexander, PLLC has invested 2.7 hours in pursuing enforcement of the Settlement Agreement and Release of Claims against Defendant, after the exercise of billing judgment, for a fee amount of \$1,185.00, as set forth in more detail in the chart below:

Attorney	Hours	Rate ¹	Total
Clif Alexander	.3	\$650.00	\$195.00
Lauren Braddy	.5	\$500.00	\$250.00
Blayne Fisher	.5	\$500.00	\$250.00
Casey Kellum	1.4	\$350.00	\$490.00
Total	2.7		\$1,185.00

¹ The above rates for Plaintiffs' Counsel have been approved by other district courts in complex hybrid wage and hour actions such as this one, and have even been previously approved in this District. Moreover, Plaintiffs' Counsel requested rates are in line with the rates recovered by other wage and hour practitioners in this District.

11. Based on the foregoing, the undersigned declarant respectfully requests that this Court approve the Settlement Agreement and Release between the parties and authorize the manner and method of the distribution of the settlement, as well as attorney's fees, as discussed therein.

12. I declare under the penalty of perjury that the foregoing information is true and correct.

Executed on: Jan 24, 2023

Signed by: *Clif Alexander*
Clif Alexander (Jan 24, 2023 16:34 CST)
Clif Alexander